



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 10, 2011

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OHIO EPA

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Mr. Mark Durno
U.S. EPA Large Lakes Research Station/ORD
U.S. EPA Region 5 Emergency Response # 1
9311 Groh Road
Grosse Ile, Michigan 48318-1697

Southwest District

Dear Mr. Durno:

Ohio EPA requests U.S. EPA's assistance to investigate a property in Dayton, Ohio, to assess the applicability of your time critical removal program with respect to abandoned waste. Specifically, a commercial property located at 1224 Keowee Street, Dayton, Ohio, was confirmed by Ohio EPA to represent a significant exposure/vandalism risk to the City of Dayton. The site has a 6,050 square foot building bordered by businesses to the northwest and southeast, and residential homes to the northeast. There is a small fenced area 100 x 20 feet to the south of the building. The facility is within the limits of the City of Dayton in Montgomery County, Ohio, with the closest residential home less than 100 feet from the facility.

There are approximately thirty (30) 55-gallon drums, thirty (30) 30-gallon containers, fifty (50) 5-gallon buckets, six (6) 250-gallon totes and one (1) 300-gallon poly tank inside the building. In the fenced area outside the building there are approximately forty-five (45) 55-gallon drums, fifteen (15) 30-gallon containers, two (2) 250-gallon totes and two (2) 500-gallon poly tanks. Containers were observed with the following labels: VanWet Acid 98; Hostacor 2098; Premaquat MQ615M; Isopropanol 99%; Hydrochloric acid; Caustic soda liquid; Soft/sour plus laundry softener; Surlite; Fluorosilicic acid solution; Scale away; Mean Green; Sulfonic acid; Hypochlorite solution; and Xylene. Most of the poly containers are in good shape, but some of the metal containers are rusted. Two 5-gallon metal containers are heavily rusted. One 30-pound bag labeled tetrapotassium pyrophosphate is open and appears to have spilled its contents. Two totes labeled "Mean Green" have a white crystallized powder at the opening. On the south wall there is a large amount of absorbent material on the floor soaking up an unknown liquid. There is ponding of this liquid under pallets next to the absorbent. It is not clear where the liquid is coming from. The floor around a drain near the back of the facility is corroded. There is a hose running from a poly tank to the drain suggesting that the facility was improperly disposing of wastes directly into the drain.

Ohio EPA does not have any analytical data for the current wastes on-site, but it is suspected that there are flammable and corrosive wastes present.

Site History:

The facility used to operate under the name Chemical Management. It appears they made cleaning solutions from several different ingredients (e.g. detergents, solvents, and acids). The last record of any inspection is from the Dayton Fire Department in June 2008. It appears the

facility was abandoned sometime between 2008 and 2009. The current property owners, John and Cindy Harley, cannot be located. Montgomery County property taxes have not been paid since 2005, and the Harley's sold their Timberwind Lane home in June 2006. The facility is allegedly in foreclosure.

On June 20, 2011, Ohio EPA received an e-mail from the McCook Field Neighborhood Association complaining about the drums at the unsecured facility. Ohio EPA conducted an investigation on June 22, 2011, and secured the fence at the facility. On June 28, 2011 Ohio EPA returned with the Dayton Fire Department to gain access to the inside of the building. This is where the ponding of an unknown liquid and the corroded drain with a hose were observed.

A significant potential for release of hazardous wastes or other materials to the environment is possible. Most industrial and municipal water supplies are derived from the Buried Valley Aquifer System (BVAS) beneath the floodplains of the Great Miami and Mad Rivers. In 1988, U.S. EPA designated the BVAS a sole source aquifer due to the fact that it is directly recharged by surface infiltration and is relied heavily upon for both potable and non-potable uses. This facility lies on the BVAS, and any releases can potentially threaten the BVAS and ultimately public health.

Conclusion:

There is an immediate exposure risk due to the unknown wastes and possible releases of these wastes. Because of this risk to human health and the environment, I hereby request that U.S. EPA conduct a site investigation to assess the applicability of a time critical removal at 1224 Keowee Street, Dayton, Ohio. Ohio EPA would also request that it be notified of any activities conducted at this site. If you have any related questions, or require any additional information, please contact Cathy Altman of Ohio EPA's Southwest District Office at (937) 285-6093, or Kelly Jeter of my staff at (614) 728-5337.

Sincerely,



Bruce McCoy
Compliance Assurance Section
Division of Materials and Waste Management

TSH/jms

pc: Cathy Altman, DMWM, SWDO
Kelly Jeter, DMWM, CO